

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

VIRGINIA BARRERA	§	
	§	
vs.	§	CIVIL ACTION
	§	NO. 5:10-CV-665 XR
	§	
MTC, INC. d/b/a MI TIERRA CAFÉ	§	
AND BAKERY d/b/a LA MARGARITA	§	
RESTAURANT & OYSTER BAR, and	§	
d/b/a RESTAURANTE PICO DE GALLO	§	

AFFIDAVIT OF RAMON D. BISSMEYER
IN SUPPORT OF SUBMISSION OF ATTORNEYS' FEES AND EXPENSES

STATE OF TEXAS	§	
	§	
COUNTY OF BEXAR	§	

BEFORE ME, the undersigned party, on this day personally appeared Ramon D. Bissmeyer, being known to me on his oath deposed and said as follows:

"My name is Ramon D. Bissmeyer. I am over the age of 18. I have never been convicted of a felony or of any crime involving moral turpitude. I am of sound mind and capable of making this Affidavit. The facts stated herein are true and correct and are based on my personal knowledge:

1. "I am a Shareholder and Attorney in the law firm of COX SMITH MATTHEWS INCORPORATED ("Cox Smith"). Cox Smith was retained to represent and provide legal services to Defendant MTC, INC. d/b/a MI TIERRA CAFÉ AND BAKERY d/b/a LA MARGARITA RESTAURANT & OYSTER BAR, and d/b/a RESTAURANTE PICO DE GALLO ("Defendant" and/or "MTC") in the above-captioned lawsuit brought by Plaintiff Virginia Barrera and Opt-In Plaintiffs Javier Andrade and Roberto Molina ("Plaintiffs"). Defendant MTC has agreed to pay for such legal services on an hourly fee basis.

2. "I am duly licensed to practice law in the State of Texas. I am also licensed to practice before the United States District Courts for the Western, Northern, Southern and Eastern Districts of Texas and the United States Fifth Circuit Court of Appeals. I have been licensed and have practiced law in Texas since 1993. I am board certified by the Texas Board of Legal Specialization in labor and employment law. I am familiar with the reasonable, necessary and customary attorneys' fees and expenses charged in matters in the state and federal courts of Texas, and with reasonable, necessary and customary fees and expenses charged in connection with legal proceedings similar to this action.

3. "I am familiar with and have reviewed the legal services provided by Cox Smith in connection with Defendant MTC's Motion for Sanctions. All of the following factors have been considered in determining attorneys' fees:

- a) The time and labor required, the novelty and difficulty of the questions involved and the skills required to perform the legal services properly;
- b) The likelihood that the acceptance of the particular employment will preclude other employment of the lawyer;
- c) The fee customarily charged in that locality for similar legal services;
- d) The amount of controversy and the results obtained;
- e) The time limitations imposed by the client or by the circumstances;
- f) The nature and length of the professional relationship with the client;
- g) The experience, reputation and ability of the lawyer or lawyers performing the services; and
- h) Whether or not the fee is fixed or contingent.

4. "At the time of the depositions in question, my hourly fee for this matter was \$395.00 per hour. This is a reasonable billing rate for files of this nature for attorneys in Texas, with my

experience in this type of litigation. Cora C. McGowan, another attorney with this firm, also assisted in this matter. Her hourly fee for this matter during the relevant time period was \$285.00 per hour. This is also a reasonable billing rate for files of this nature for attorneys with Ms. McGowan's experience.¹ Defendant MTC has agreed to pay Cox Smith for legal fees incurred on an hourly basis, plus expenses.

5. "Cox Smith has spent 6.80 hours of time between myself and Ms. McGowan in connection with Defendant MTC's Motion for Sanctions, including (a) conferring with Plaintiffs' counsel concerning this dispute; (b) preparing for the depositions of Plaintiffs Andrade and Molina; (c) attending the depositions of Plaintiffs Andrade and Molina; (d) preparing Defendant MTC's Motion for Sanctions; (e) conducting legal research and analysis in support of the Motion for Sanctions; and (f) preparing this present Affidavit and Submission of Attorneys' Fees.

6. "The following is a true and correct list of Cox Smith's fees related to the actions identified in the preceding paragraphs in this matter:

<u>Date</u>	<u>Attorney</u>	<u>Time</u>	<u>Description</u>
09/07/2011	C. McGowan	0.70	Prepare for the depositions of Opt-In Plaintiffs J. Andrade and R. Molina in the event they show up.
09/07/2011	C. McGowan	0.10	Take Certificates of Non-Appearance for depositions for Opt-In Plaintiffs J. Andrade and R. Molina.
10/10/2011	C. McGowan	0.70	Draft Motion for Sanctions regarding J. Andrade and R. Molina.

¹ True and correct copies of the curriculum vitae for each Cox Smith attorney who has assisted on this case are attached hereto and incorporated by reference herein as Exhibit A.

10/11/2011	C. McGowan	1.80	Continue to draft Defendant's Motion for Sanctions.
10/12/2011	C. McGowan	0.60	Revise the Motion for Sanctions.
10/17/2011	R. Bissmeyer	0.30	Reviewing information with C. McGowan regarding Motion for Sanctions.
10/17/2011	C. McGowan	1.40	Revise Defendant's Motion for Sanctions.
10/27/2011	R. Bissmeyer	0.30	Revising Motion for Sanctions.
10/27/2011	C. McGowan	0.10	E-mail correspondence to P. Cortez regarding Defendant's Motion for Sanctions.
10/27/2011	C. McGowan	0.30	Telephone conference with J. Young regarding Motion for Sanctions.
10/28/2011	C. McGowan	0.20	Telephone conference with P. Cortez regarding Motion for Sanctions.
10/28/2011	C. McGowan	0.30	Revise Defendant's Motion for Sanctions.

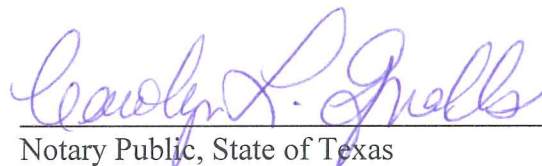
7. "Defendant MTC has incurred \$2,004.00 in attorneys' fees in connection with its Motion for Sanctions and the above-described related tasks. These efforts and this amount of time were reasonable and necessary. Based upon the foregoing, in my opinion, in Bexar County, Texas, a reasonable fee for the necessary legal services provided to Defendant MTC by the law firm of Cox Smith and me in connection with the Motion for Sanctions is \$2,004.00.

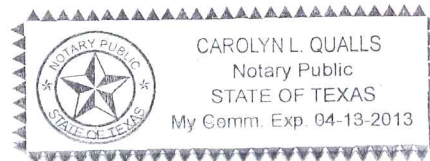
8. "Further, attached to this Affidavit is a copy of the invoice for services rendered by the court reporter for attending the depositions of Plaintiffs Andrade and Molina and taking the Certificates of Non-Appearance, in the amount of \$300.00, and which services were paid by Cox Smith.²

"Further, Affiant sayeth not."


Ramon D. Bissmeyer

SUBSCRIBED and SWORN to before me on this the 1st day of March, 2012, to which witness my hand and official seal.


Notary Public, State of Texas



² A true and correct copy of the invoice billed in this matter by the court reporter, redacted to exclude privileged information, is attached hereto and incorporated by reference as Exhibit B.

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ATTORNEYS

Ramon D. Bissmeyer

Shareholder

rbissmeyer@coxsmith.com

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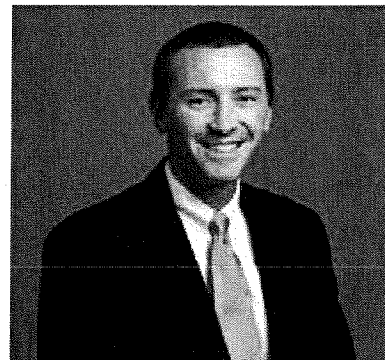
112 E. Pecan Street

Suite 1800

San Antonio, Texas 78205

210-554-5589 tel

210-226-8395 fax

[Overview](#) | [Experience](#) | [News/Events](#)

Ray Bissmeyer is Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization. He frequently defends clients in state and federal courts and before state and federal administrative agencies, such as the Department of Labor and the Equal Employment Opportunity Commission. He also counsels clients regarding most aspects of the employment relationship, including the development of employment policies and procedures, preparation and enforcement of confidentiality, non-solicitation and non-competition provisions, best practices related to the protection of confidential information and key employees, employee discipline and termination, management training and investigation of employee misconduct. Additionally, Ray has worked with clients to resolve employment-related claims through various forms of alternative dispute resolution by drafting mandatory grievance and arbitration procedures and representing employers in mediation and arbitration. Ray often participates in corporate transactions by reviewing employment-related information disclosed through due diligence and reviewing or preparing employment agreements, covenants not to compete, non-solicitation agreements and non-disclosure agreements. He is a frequent speaker and author on topics, issues and legislative developments related to labor and employment-related matters.

PROFESSIONAL AND COMMUNITY ACTIVITIES

- Federal Bar Association
- American Bar Association, Labor and Employment Law and Litigation Sections
- Texas Bar Association, Labor and Employment Law, Litigation and Appellate Sections
- San Antonio Bar Association
- American Employment Law Council, 2002-present
- San Antonio Air Conditioning Contractors Association, Labor Attorney, 2003-present
- Cox Smith Associates Development Committee, Co-Chair, 2003-present
- Governors Club, 2005-present

Related Practices

Employment and Employer Rights
Litigation / Arbitration
Intellectual Property

Related Industries

Energy / Utilities
Technology
Retail
Food and Beverage
Hospitality and Tourism

Certifications

Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization

Education

- The University of Texas School of Law, J.D., 1993
- Southern Methodist University, B.A., *cum laude*, 1990
- Southern Methodist University, B.B.A., 1990

Admitted to Practice**EXHIBIT A**

- Alamo Heights Fort Sam Houston Youth Soccer, Head Coach, 2001, Fall 2005-present; Assistant Coach, 1995-1998 and 2002-Spring 2005; Board Member, 2001-present; Commissioner of Coaches, 2003-2004; President, January, 2005-present
- Kinetic Kids, Board Member 2009-present; Board Resource Committee Chair 2010-present
- National Multiple Sclerosis Society, Lone Star Chapter, MS Walk Steering Committee, 2007 and 2008
- Austin-San Antonio Corridor Council, Executive Committee Member, 2003-2008; Economic Development Committee Member, 2003-2006
- Texas, 1993
- United States Court of Appeals Fifth Circuit
- United States District Court Northern, Southern, Western and Eastern Districts of Texas

PROFESSIONAL RECOGNITION

- Martindale-Hubbell® AV® Preeminent™ Peer Review Rating
- Selected for inclusion in *The Best Lawyers in America*®, 2007-2012
- Selected for inclusion as a "Texas Super Lawyer," *Law and Politics Magazine*, 2008-2011
- Selected for inclusion as a "Corporate Counsel Super Lawyer, Employment Litigation: Defense," *Law and Politics Magazine*, 2008-2010
- *Scene in SA*, "San Antonio's Best Lawyers," 2005-2008
- Selected for inclusion as a "Texas Rising Star," *Law and Politics Magazine*, 2005-2007

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Ramon D. Bissmeyer

Shareholder

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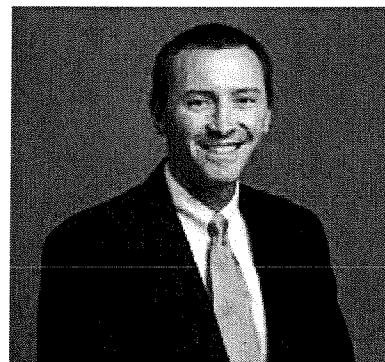
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210-226-8395 fax

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Represented automobile dealership with respect to claims by former salesman alleging age discrimination, national origin discrimination and retaliation. After granting an award of attorneys' fees as a sanction for the former employee's failure to cooperate in discovery, the Court later granted our client's Motion for Summary Judgment as to all claims asserted.

Represented nationwide Human Resources consulting firm and one of its employees who were retained to investigate claims of misconduct by a manager at a third-party company. Based upon the results of that investigation, the company terminated the employment of the manager, who filed suit against her former employer, the HR consulting firm and the individual who conducted the investigation. All claims (of intentional infliction of emotional distress and false imprisonment) against our clients were dismissed by way of Motion for Summary Judgment, and the Court's Order granting summary judgment was subsequently affirmed on appeal following oral argument.

Represented company providing cable installation services for national telecommunications company in potential class and collective action filed in US District Court by several former independent contractors alleging that they should have been classified as employees and asserting claims under the Fair Labor Standards Act ("FLSA"), the Employee Retirement Income Security Act ("ERISA"), the Texas Deceptive Trade Practices Act ("DTPA"), as well as claims of unjust enrichment, negligent misrepresentation, promissory estoppel, fraud and fraudulent inducement. Plaintiffs' efforts to certify state-wide class and collective actions that could have included over 700 class members were defeated, and a plaintiff who had signed an agreement requiring arbitration was compelled to arbitrate all of his claims. Shortly thereafter, Plaintiff's claims were resolved with Court approval, and the case was dismissed.

Interference, Discrimination and Retaliation Claims

Represented publicly traded provider of land contract drilling services in arbitration of

Related Practices

Employment and Employer Rights
Litigation / Arbitration
Intellectual Property

Related Industries

Energy / Utilities
Technology
Retail
Food and Beverage
Hospitality and Tourism

Certifications

Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization

Education

- The University of Texas School of Law, J.D., 1993
- Southern Methodist University, B.A., *cum laude*, 1990
- Southern Methodist University, B.B.A., 1990

Admitted to Practice

interference, discrimination and retaliation claims under the Family and Medical Leave Act ("FMLA"), wrongful termination in violation of the Surface Transportation Assistance Act ("STAA"), wrongful termination for refusing to commit an illegal act, wrongful termination in violation of the Sarbanes-Oxley Act of 2002 ("Sarbanes-Oxley"), intentional infliction of emotional distress and defamation. All claims except FMLA claims were dismissed through Motion for Summary Judgment, and client prevailed on FMLA claims through arbitration.

- Texas, 1993
- United States Court of Appeals Fifth Circuit
- United States District Court Northern, Southern, Western and Eastern Districts of Texas

Act as Primary Counsel for Manufacturing Company with Respect to Employee Benefit Plan Matters

Prepared work-related injury plans for union and non-union employees. Advise client in connection with plan administration, claim review and procedures, employee releases, ERISA preemption, and litigation matters. Advise client with respect to group health plan, cafeteria plan, COBRA, and HIPAA matters.

Employment Counseling and Arbitration

We represent this publicly traded client in all employment matters through out the various states in which it operates. Our representation has included general day to day counseling but also includes assisting in administrative charges, wage and hour investigations, and a number of litigation matters.

Employment Counseling and Litigation

We represent a team of more than 300 physicians and medical professionals in all employment matters. Our representation has included general day to day counseling but also includes assisting in administrative charges, wage and hour investigations, and litigation matters.

Employment Counseling, Training and Litigation

This client is an electric cooperative providing electric service to nearly 65,000 members in thirteen Texas counties. We represent this client in employment-related matters, including employee counseling and termination, Employee Handbook review, administrative charges and litigation. Members of the Firm's Employee Benefits, Energy, Real Estate and Condemnation practices have also worked with this client.

Employment Counseling, Training, Litigation and Arbitration

This client currently operates a variety of state and federally-funded programs in eight states, including Migrant Seasonal Head Start, Child Care Services, Workforce, Texas Early Education Model ("TEEM") Healthy Marriages Development, Safe Haven and Head Start / Early Head Start programs. We represent this client in employment-related matters, including employee counseling and termination, supervisor training, development and implementation of a Dispute Resolution Policy, administrative charges, litigation and arbitration. We have also worked with this client in employee benefits-related matters.

Acquisition of a State Bank

In January 2007, we assisted our client in the acquisition of a Southwest Texas regional banking institution, expanding our client's financial services imprint in Southwest Texas.

Sale of Security Guard Services Company

Representation of London Stock Exchange Company in the approximately \$75 million

disposition of its United States security guard and electronic security divisions.

Acquisition of the Largest Privately Owned Pest Control Business in the United States

Representation of London Stock Exchange Company in an approximate \$160 million stock and asset acquisition of the largest privately owned United States pest control business. Transaction was significant due to strategic importance to client, as target would become platform for North American growth in this industry.

Breach of Contract and Defamation Litigation

Represented an aviation company against claims of breach of contract and defamation through judgment and state court of appeals.

Breach of Contract and Discrimination Litigation

Assisted in representation of a national publishing company against claims of breach of contract, fraud, intentional infliction of emotional distress, age discrimination and disability discrimination through judgment and federal court of appeals.

Discrimination and Retaliation Arbitration

Represented publicly traded provider of land contract drilling services in arbitration of discrimination and retaliation claims by former employee.

Discrimination and Retaliation Litigation

Represented a non-profit social services agency against claims of national origin discrimination and retaliation through judgment and federal court of appeals.

Discrimination and Retaliation Litigation

Represented employer in federal court in Arkansas through judgment on claims of race and sex discrimination and retaliation.

Discrimination Litigation

Represented a banking institution against a claim of age discrimination through judgment and federal court of appeals.

Discrimination, Harassment and Retaliation Litigation

Represented a law firm against claims of age discrimination, sex discrimination, sexual harassment, retaliation and intentional infliction of emotional distress through judgment and state court of appeals.

Discrimination, Retaliation and Privacy Litigation

Represented corporate and individual defendants in federal court in Austin, Texas through motion for summary judgment on claims of race discrimination, retaliation, "theft of personal data" and invasion of privacy.

Federal Labor Law Preemption Litigation

Represented a national trucking company against personal injury claims by drivers through removal to federal court, judgment and federal court of appeals by arguing that such claims were preempted by § 301 of the Labor Management Relations Act.

Federal Labor Law Preemption Litigation

Represented non-subscriber employer against personal injury claims by employee through removal to federal court and judgment based on preemption by § 301 of the Labor Management Relations Act.

Fraud and Breach of Contract Arbitration

Represented a credit union against claims of fraudulent inducement, breach of contract, intentional infliction of emotional distress and defamation through arbitration.

Harassment and Retaliation Litigation

Represented a physician against claims of breach of contract, fraud, and intentional infliction of emotional distress, sexual harassment and retaliation through trial to state district court.

Non-compete and Proprietary Information Litigation

Represented multiple defendants, including a start-up company, in injunction proceedings involving alleged theft of proprietary information and tortious interference with non-competition agreement.

Non-compete, Non-solicitation and Non-disclosure Litigation

Represented national business technology integration provider in claims by national competitor alleging tortious interference with non-competition, non-solicitation and non-disclosure agreement signed by competitor's former employee.

Non-solicitation and Non-disclosure Litigation

Represented national provider of computer hardware, software and related services in litigation against former employees and the competitor with whom the employees accepted employment for claims involving the possession and use of proprietary information and violation of a non-solicitation agreement.

State Court Litigation

Represented a national food services company in several cases against claims ranging from workers' compensation retaliation to intentional infliction of emotional distress and defamation.

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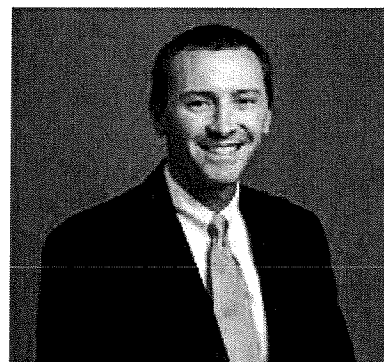
Ramon D. Bissmeyer

Shareholder

rbissmeyer@coxsmith.com

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06.07.11 Harassment and Retaliation Workshop 06.23.11

NEWS/PUBLICATIONS

10.08.09 "Employers Learn Benefits of Hiring Disabled Workers," Victoria Advocate
08.07.08 "Employers Attend Workshop On Harassment In The Workplace," The
Brownsville Herald
05.14.07 "Handling Discrimination in the Workplace," the News

PRESS RELEASES

09.13.11 27 Cox Smith Attorneys Named 2011 Texas Super Lawyers
09.09.11 SAN ANTONIO::50 Cox Smith Attorneys Named 2012 Best Lawyers in
America; Firm is Top Listed in San Antonio in 26 Categories
10.27.10 49 Cox Smith lawyers recognized as Best Lawyers in America; Deborah
Williamson and Mary Potter named "Lawyer of the Year"
09.24.10 28 Cox Smith Attorneys Named 2010 Texas Super Lawyers
10.01.09 23 Cox Smith Attorneys Selected as Texas Super Lawyers 2009

UPCOMING SEMINARS/EVENTS

03.01.12 Cox Smith Employment and Employer Rights Workshop - El Paso

PAST SEMINARS/EVENTS

11.11.11 Cox Smith Employment FLSA Workshop
10.12.11 "How Annoying: Update on Harassment and Retaliation," presenter Ray
Bissmeyer, LAHRM Human Resources Update: Voyage into the Unknown
08.25.11 Cox Smith Employment and Employer Rights Workshop - El Paso
06.23.11 Cox Smith Employment and Employer Rights Harassment and Retaliation
Workshop

Related Practices

Employment and Employer
Rights
Litigation / Arbitration
Intellectual Property

Related Industries

Energy / Utilities
Technology
Retail
Food and Beverage
Hospitality and Tourism

Certifications

Board Certified in Labor and
Employment Law by the
Texas Board of Legal
Specialization

Education

- The University of Texas
School of Law, J.D., 1993
- Southern Methodist
University, B.A., *cum
laude*, 1990
- Southern Methodist
University, B.B.A., 1990

Admitted to Practice

04.09.10 "How to Keep Your Shield from Becoming a Sword – Effectively Handling Employee Complaints," speakers Ray Bissmeyer and Donna McElroy, Cox Smith Employment and Employer Rights Workshop

- Texas, 1993
- United States Court of Appeals Fifth Circuit
- United States District Court Northern, Southern, Western and Eastern Districts of Texas

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Associate

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Cally McGowan assists clients with matters related to employment and employer rights, where she often serves as an extension of a company's human resource department by providing advice on all legal aspects of employment and labor relations. Her practice is focused on guiding emerging growth to publicly-traded companies in employment matters throughout the various states in which they operate, with an emphasis on employment-related litigation. Cally frequently counsels employers on Equal Employment Opportunity Commission ("EEOC") charges of discrimination, Fair Labor Standards Act ("FLSA") issues and Family & Medical Leave Act ("FMLA") compliance.

PROFESSIONAL AND COMMUNITY ACTIVITIES

- Bexar County Women's Bar Association
- San Antonio Young Lawyers Association
- Federal Bar Association
- San Antonio Bar Association

PROFESSIONAL RECOGNITION

- *Scene in SA*, "San Antonio's Rising Stars," 2009
- Texas Tech Law Review, Articles Editor, 2006-2007
- Phi Delta Phi Legal Fraternity

Related Practices

Employment and Employer Rights
Immigration and International Trade
Litigation / Arbitration

Related Industries

Retail
Education
Food and Beverage
Government and Public Agencies

Education

- Texas Tech University
School of Law, J.D., *cum laude*, 2007
- Texas Tech University,
M.B.A., 2007
- Vanderbilt University,
B.A., *magna cum laude*, 2004

Admitted to Practice

- Texas, 2007
- United States District
Court Western District of
Texas

- United States District
Court Northern District of
Texas
- United States District
Court Southern District of
Texas

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- Represented nationwide Human Resources consulting firm and one of its employees who were retained to investigate claims of misconduct by a manager at a third-party company. Based upon the results of that investigation, the company terminated the employment of the manager, who filed suit against her former employer, the HR consulting firm and the individual who conducted the investigation. All claims (of intentional infliction of emotional distress and false imprisonment) against our clients were dismissed by way of Motion for Summary Judgment, and the Court's Order granting summary judgment was subsequently affirmed on appeal following oral argument.
- Represented company providing cable installation services for national telecommunications company in potential class and collective action filed in US District Court by several former independent contractors alleging that they should have been classified as employees and asserting claims under the Fair Labor Standards Act ("FLSA"), the Employee Retirement Income Security Act ("ERISA"), the Texas Deceptive Trade Practices Act ("DTPA"), as well as claims of unjust enrichment, negligent misrepresentation, promissory estoppel, fraud and fraudulent inducement. Plaintiffs' efforts to certify state-wide class and collective actions that could have included over 700 class members were defeated, and a plaintiff who had signed an agreement requiring arbitration was compelled to arbitrate all of his claims. Shortly thereafter, Plaintiff's claims were resolved with Court approval, and the case was dismissed.
- Represented publicly traded provider of land contract drilling services in arbitration of interference, discrimination and retaliation claims under the Family and Medical Leave Act ("FMLA"), wrongful termination in violation of the Surface Transportation Assistance Act ("STAA"), wrongful termination for refusing to commit an illegal act, wrongful termination in violation of the Sarbanes-Oxley Act of 2002 ("Sarbanes-Oxley"), intentional infliction of emotional distress and defamation. All claims except FMLA claims were dismissed through Motion for Summary Judgment, and client prevailed on FMLA claims through arbitration.

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Employment and Employer Rights
Immigration and International Trade
Litigation / Arbitration

Related Industries

Retail
Education
Food and Beverage
Government and Public Agencies

Education


- Texas Tech University School of Law, J.D., *cum laude*, 2007
- Texas Tech University, M.B.A., 2007
- Vanderbilt University, B.A., *magna cum laude*, 2004

Admitted to Practice

- Texas, 2007
- United States District Court Western District of Texas

- Dismissed race discrimination claims where Texas whistleblower claims were also asserted through a Plea to the Jurisdiction.
- Obtained summary judgment in State court in case involving significant investigation of employee's use of email where terminated employee claimed sex discrimination.
- United States District Court Northern District of Texas
- United States District Court Southern District of Texas

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CLIENT ALERTS

11.09.09 McElroy, McGowan Obtain Summary Judgment in Favor of SAWS

PAST SEMINARS/EVENTS

06.11.10 HR 101 – The Nuts and Bolts Every HR Professional Must Know

Related Practices

Employment and Employer Rights
Immigration and International Trade
Litigation / Arbitration

Related Industries

Retail
Education
Food and Beverage
Government and Public Agencies

Education

- Texas Tech University
School of Law, J.D., *cum laude*, 2007
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- Vanderbilt University,
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Admitted to Practice

- Texas, 2007
- United States District Court Western District of Texas

- United States District
Court Northern District of
Texas
- United States District
Court Southern District of
Texas

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Alamo City Reporting

PO Box 790886

San Antonio, TX 78279-0886

Employer I.D. #: 20-5044865

Invoice

DATE	INVOICE #
9/8/2011	3303CML

BILL TO
Cox Smith Matthews Incorporated Cora C. McGowan 1800 Weston Centre 112 East Pecan Street San Antonio, Texas 78205

RE:
Virginia Barrera vs. MTC, Inc. d/b/a Mi Tierra Cafe, et al. USDC West. Dist. of TX. SA Div. No. 5:10-CV-665 XR

QTY	ITEM	DESCRIPTION	RATE	AMOUNT
		Copy of deposition of Thomas Allen Potter. Taken on September 3, 2011.		
		Exhibits		
	Nonappearance	Certificate of Nonappearance Deposition of Javier Andrade and Statement of Counsel. Taken on September 7, 2011.	150.00	150.00
	Nonappearance	Certificate of Nonappearance Deposition of Roberto Molina and Statement of Counsel. Taken on September 7, 2011.	150.00	150.00
It's been a pleasure working with you. If you have any questions about this invoice, please call:			Total	

ALAMO CITY REPORTING

PH: (210) 710-3890 FAX: (210) 524-9686